

## EXHIBIT 32

IN THE CIRCUIT COURT OF THE STATE OF OREGON  
FOR THE COUNTY OF JACKSON

In the Matter of:

HEIDI MARIE BROWN,

Petitioner,

and

ARNAUD PARIS,

Respondent, Pro Per.

Case No. 23CN05721

**MOTION FOR RECONSIDERATION OF  
MOTION FOR DISQUALIFICATION OF  
JUDGE ORR FOR LACK OF  
IMPARTIALITY AND DENIAL OF DUE  
PROCESS AND SUPPORTING  
AFFIDAVIT - ORS 14.250**

On January 3<sup>rd</sup> 2024, I, Arnaud Paris, Respondent, Pro Per, filed a motion for disqualification of Judge Orr based on substantiated evidence, including court transcripts, that Judge Orr was so biased against Respondent in open-court to the point of making improper jokes about French people and the French judicial system while Respondent is a French National and brought in front of this court a French judgment that the court rejected while refusing due process to Respondent.

Judge Orr has just been assigned to this new case 23CN05721 and in light of the evidence presented in the motion for disqualification filed on January 3<sup>rd</sup> with the Jackson County court, Respondent has clear ground to believe that he wouldn't be given a "fair and impartial trial or hearing".

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1 Judge Bloom considered the motion for disqualification without Respondent  
2 being informed and denied that motion without any justification for the reason and legal  
3 basis for this denial.

4 This motion seeks reconsideration of the decision to deny my previous motion for  
5 disqualification under ORS 14.250, asserting that the decision lacks legal justification  
6 and fails to adhere to required procedural protections.

7  
8 **Grounds for Reconsideration :**

- 9 • **Denial Lacks Statutory Basis:** ORS 14.250 does not provide explicit grounds  
10 for a judge to reject a motion for disqualification without a substantive legal basis.  
11 The absence of a detailed denial from Judge Bloom indicates a procedural  
12 oversight and a deviation from the principles of law.
- 13 • **Requirement for Legal Justification:** A mere denial without citing specific legal  
14 reasons is insufficient and undermines the procedural integrity of the court. The  
15 law mandates that decisions, especially denials of motions for disqualification, be  
16 grounded in clear legal rationale.
- 17 • **Insufficiency of Grounds for Denial:** The denial of the motion without  
18 addressing the cited reasons for disqualification suggests an insufficiency of  
19 grounds, making the denial procedurally defective.
- 20 • **Non-Compliance with Disqualification Law:** By not following the clear  
21 mandate of ORS 14.250 regarding disqualification, the court has not adhered to  
22 the statutory requirement, raising concerns about impartiality and fair trial rights.

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- 1       • **Procedural Protection and Application of Law:** The court's refusal to engage  
2       with the motion's arguments or to apply the law as required constitutes a failure  
3       to provide the most basic procedural protections to the parties involved.  
4

5 **Argument** The decision by Judge Bloom to deny the motion for disqualification without  
6 substantive justification not only contravenes ORS 14.250 but also sets a concerning  
7 precedent for the disregard of legal standards and procedural fairness. This is  
8 particularly troubling and concerning in light of the clear denial of due process and the  
9 judicial bias that took place already in Jackson County through Judge Orr. The absence  
10 of a reasoned explanation by Judge Bloom or reference to applicable law in his denial  
11 undermines the judiciary's responsibility to operate within the bounds of established  
12 legal frameworks.  
13

14 **Request for Relief** I respectfully request that this court:

- 15       • Reconsider and overturn the denial of the motion for disqualification of Judge Orr  
16       • Provide a detailed legal justification for any decision made regarding this motion,  
17       in compliance with ORS 14.250 and the principles of due process.  
18

19 **Conclusion** The integrity of the judicial process depends on adherence to the rule of  
20 law and procedural fairness. I urge the court to reconsider its decision in light of the  
21 arguments presented herein and in the original motion for disqualification and to ensure  
22 that its proceedings reflect the legal standards set forth by the state of Oregon.  
23  
24

1 I hereby declare that the above statement is true to the best of my knowledge  
2 and belief, and that I understand it is made for use as evidence in court and is subject to  
3 penalty for perjury of the laws in the state of Oregon.  
4

5 Prepared on February 22nd 2024 in Paris and sent to the court by FEDEX

6  
7   
8 By: Arnaud Paris  
9 ARNAUD PARIS, Respondent, Pro Per  
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**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **MOTION FOR RECONSIDERATION OF  
MOTION FOR DISQUALIFICATION OF JUDGE ORR FOR LACK OF  
IMPARTIALITY AND DENIAL OF DUE PROCESS AND SUPPORTING AFFIDAVIT  
- ORS 14.250** on the following party:

Heidi Marie Brown  
2256 Abbott Ave  
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Respondent

Taylor L.M. Murdoch,  
Buckley Law P.C.  
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Last Known Attorney for Respondent

By the following method or methods:

☐ by **mailing** full, true, and correct copies thereof in sealed, first class postage  
prepaid envelopes, addressed to the attorneys(s) as shown above, the last known office address of  
the attorney(s), and deposited with the United States Postal Service at Portland, Oregon on the date  
set forth below.

☒ by **emailing** full, true, and correct copies thereof to the attorney(s) at the email address  
shown above, which is the last known email address for the attorney(s) office, on the date set forth  
below.

☐ by **faxing** full, true, and correct copies thereof to the attorney(s) at the fax number(s)  
shown above, which is the last known fax number for the attorney(s) office, on the date set forth  
below. The receiving fax machines were operating at the time of service and the transmission was  
properly completed.

☐ by selecting the individual(s) listed above as a service contact when preparing this electronic  
filing submission, thus causing the individual(s) to be served by means of the **court's electronic filing  
system**.

Prepared on February 22nd 2024 in Paris and sent to the court by FEDEX

By: 

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